

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|---|---|--|
| Trademark Holder Identified in Exhibit 1, |) | |
| |) | Case No.:22-cv-1354 |
| |) | |
| Plaintiff, |) | |
| v. |) | Judge: Honorable Jorge L. Alonso |
| |) | |
| Does 1-337, As Identified in Exhibit 2, |) | |
| |) | Magistrate: Honorable Jeffrey T. Gilbert |
| Defendants. |) | |
| |) | |

**PLAINTIFF'S *EX PARTE* MOTION TO EXTEND TEMPORARY RESTRAINING
ORDER FOR GOOD CAUSE**

Plaintiff, Trademark Holder Identified in Exhibit 1, seeks an extension of the Sealed Ex Parte Temporary Restraining Order entered by this Court on March 30, 2022, and would ask the Court that the TRO be extended for good cause which exists as follows:

Plaintiff has been diligent. Plaintiff has already posted the required \$10,000 Surety Bond with the Clerk of Court and served subpoenas on all the relevant third parties. However, due to the ongoing pandemic, response times have been lengthy even when ideal circumstances exist. Further complicating the response time is the upcoming Qingming Festival (Grave Sweeping (Honoring the Dead Day)) celebrations across Asia.

Plaintiff anticipates being able to serve all the Defendants, but likely will not be able to do so by April 13, 2022, the day the TRO expires.

Accordingly, despite exercising diligence, due to events and actions outside the Plaintiff's control, the Plaintiff asks the Court to extend the TRO, 14 additional days, or until April 27, 2022 to allow Plaintiff to utilize the TRO and effectuate service of process against all of the Defendants. Plaintiff will effectuate service of process on all Defendants and file its Motion for Preliminary

Injunction by, or earlier than, April 22, 2022.

Dated this April 8th, 2022

Respectfully submitted,

By: _____ /s/ Rishi Nair

Rishi Nair

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